

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of _____

Division _____

John F. Rocha

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Christina Paxson

+

Brown University

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	John F. Rocha
Street Address	8 Highland St.
City and County	Pawtucket
State and Zip Code	Rhode Island 02860
Telephone Number	401-723-4888
E-mail Address	xxx99xxx66xxx@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name	Christina Paxson
Job or Title <i>(if known)</i>	College President
Street Address	75 Waterman St
City and County	Providence
State and Zip Code	Rhode Island 02912
Telephone Number	401-863-1000
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Brown University
Job or Title <i>(if known)</i>	Private School
Street Address	75 Waterman St
City and County	Providence
State and Zip Code	Rhode Island 02912
Telephone Number	401-863-1000
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Discrimination - False Arrest

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) John F Rocha, is a citizen of the
State of (name) RHODE ISLAND.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

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b. If the defendant is a corporation

The defendant, (name) Christina Paxson, is incorporated under
the laws of the State of (name) Rhode Island, and has its
principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

4/28/25

Signature of Plaintiff



Printed Name of Plaintiff

John F. Rocha

B. For Attorneys

Date of signing: _____

Signature of Attorney

None

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Plaintiff

John F. Rocha

Defendants

Christina Paxson

Brown University

Statement of claim

I am filing this lawsuit because of a false arrest on a fabricated case that was a reply to an old civil rights case settlement request. On December 8 2022 a letter and DVD was delivered to Brown University. This package was from me and I have delivery confirmation from US post office. The settlement request was for \$1,500,000.00 to be deposited into my Bank account before the end of the year. The last day of deposit would be December 31st. On December 30th I was pulled over and arrested in Sutton Ma. For a New Bedford Ma. arrest warrant that I knew nothing about. New Bedford has no proof that I received a citation, court summons or a subpoena. I knew at this time that it was just another attempt from Brown University to address the issue of my story of a civil rights violation that I have been talking about since the year 2000. Everyone was working against me in this case. It was a hit and run incident with a company truck that I was driving for the Foley Excavation Company. I had a public defender who did not use the information that I supplied about Brown University. Our first trial was planned for August 7 2023 but it was cancelled because according to the prosecution Kenneth Foley, the prosecutions only witness was ill. I learned two weeks later that Kenneth Foley didn't even know that I had been arrested. Nothing was done to drop the charges and close this case. Instead the district attorney Thomas Quinn demanded that I have a physiological evaluation. My attorney agreed with him and told me that he would not represent me unless I did. I have made over 3,000 DVDs telling my story about the traumatic experience at Brown and one of their goals has been to get me labeled as mentally unstable. This is what this is all about. When I was 13 I was falsely arrested by Brown and Providence Police along with many other minority teenager's. We were kept overnight and polaroid mug shot were taken of during the night. The photos were passed out in the community and we were labeled as criminals without being charged. This took away any self-esteem that I might have had. I stayed drunk and high until 1988. A few years after getting sober and clean

I had to deal with unrepressed memory of that night in a dark jail cell. I approached the former Brown University president Ruth Simmons in 2008 and she ignored me even though I went to the 2008 Brown Graduation wearing an orange jumpsuit with Felon on the back. She was black president of Brown and at that time they had a black police chief. They replied by sending a black Brown police detective to the YMCA to threaten me with arrest for trespassing when I delivered a DVD and a letter telling my story to her office in 2010. When I would not stop passing out DVDs I believe that they hired private detectives to get me into trouble. One of the things that were done was when I sold a blue Chevrolet Corvette on EBay in 2016. I received a check from what looked like an Egyptian country and a few days later I lost access to my Ebay account to show that I had received that check for the payment of an automobile. I believe that homeland security has me on their list now because that check could have come from anyone. All they need is suspicion that you have a connection to a terrorist group to become a threat. There are many things that have been done that only can be done by people in control like getting a prosecutor to lie to a judge in court for a minor car accident. The list is long of episodes done to stop me from telling my story.

Relief

I am seeking damages from the defendants and the amount is \$10,000,000.00 for the physical, mental and emotional trauma that I believe will never stop as long as I keep fighting for the truth. If Brown University had simply apologized to me in 2000 when I first told the story that would have been enough.